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LUCENT TECHNOLOGIES INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING, an agency of the State of
California,

Plaintiff, and

STEVEN J. CARAUDDO

Plaintiff-Intervenor

v.

LUCENT TECHNOLOGIES, INC., and
DOES 1 through 20,

Defendants.

CASE NO.: 3:07-cv-03747-PJH

**DECLARATION OF LESLIE J. MANN
IN SUPPORT OF DEFENDANT LUCENT
TECHNOLOGIES INC.'S REPLY
MEMORANDUM IN SUPPORT OF ITS
MOTION FOR SUMMARY JUDGMENT
OR IN THE ALTERNATIVE PARTIAL
SUMMARY JUDGMENT**

Hearing Date: November 19, 2008
Time: 9:00 a.m.
Courtroom: C, 15th Floor
The Honorable Phyllis J. Hamilton

I, Leslie J. Mann, declare:

1. I am a Senior Attorney with the law firm of Epstein Becker and Green, P.C., counsel of record for Lucent Technologies Inc. ("Defendant") in this matter. I am an active member in good standing of the Bar of the State of California. I am making this Declaration in Support of Defendant's Reply Memorandum in Support of Its Motion for Summary Judgment or in the Alternative Partial Summary Judgment. All the deposition excerpts attached to my

1 declaration do not raise new issues but rather respond to factual inaccuracies in and evidentiary
2 objections to Plaintiff's Opposition. If called as a witness in this action, I could and would
3 competently testify to the following facts, based on my own personal knowledge.

4 2. Attached hereto as Exhibit 1 and incorporated herein by reference are true and
5 correct copies of excerpts from the Deposition of Theresa Andrechick taken on August 12, 2008.
6 The transcript appears to be a correct rendition of the occurrences at the deposition which Peter
7 Berk attended.

8 3. Attached hereto as Exhibit 2 and incorporated herein by reference are true and
9 correct copies of excerpts from the Deposition of Christopher Lewis Camacho taken on July 31,
10 2008. The transcript appears to be a correct rendition of the occurrences at the deposition which
11 I attended.

12 4. Attached hereto as Exhibit 3 and incorporated herein by reference are true and
13 correct copies of excerpts from the Deposition of Micheline Carauddo taken on September 12,
14 2008. The transcript appears to be a correct rendition of the occurrences at the deposition which
15 I attended.

16 5. Attached hereto as Exhibit 4 and incorporated herein by reference are true and
17 correct copies of excerpts from the Deposition of Plaintiff-Intervenor Steven J. Carauddo,
18 Volume 1 taken on July 22, 2008. The transcript appears to be a correct rendition of the
19 occurrences at the deposition which I attended.

20 6. Attached hereto as Exhibit 5 and incorporated herein by reference are true and
21 correct copies of excerpts from the Deposition of Allen Kaisler-Meza, M.D. taken on September
22 12, 2008. The transcript appears to be a correct rendition of the occurrences at the deposition
23 which I attended.

24 7. Attached hereto as Exhibit "6" is a true and correct copy of My correspondence to
25 Plaintiff-Intervenor's Counsel Emily Nugent, dated October 1, 2008, in which I informed Ms.
26 Nugent that the seven installers referenced in the Occupational Requirements forms produced in
27 discovery do not work in California..

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct and that this declaration was executed on this 5th day of November,
3 2008, at San Francisco, California.

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5 /s/ Leslie J. Mann
6 Leslie J. Mann
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